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December 8, 1995

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William F. Caton  
Acting Secretary  
Federal Communications Commission  
Mail Stop 1170  
1919 M Street, N.W., Room 222  
Washington, D.C. 20554

RECEIVED

DEC - 8 1995

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

Dear Mr. Caton:

Re: MM Docket No. 92-260 - Cable Home Wiring; CC Docket No. 79-105 - Inside Wiring

Yesterday, Lea L. Jones, Regulatory Director, Pacific Telesis Enhanced Services, Kevin Carbone, Marketing Manager, Pacific Telesis Video Services and I met with Mary P. McManus, Legal Advisor to Commissioner Ness, and Kevin Carbone and I met with David Furth and Suzanne Toller, Legal Advisors, and Robert Tanner, intern, Office of Commissioner Chong, to discuss issues summarized in the attachment. Please associate this material with the above referenced proceedings.

We are submitting two copies of this notice in accordance with Section 1.1206(a)(1) of the Commission's Rules.

Please stamp and return the provided copy to confirm your receipt. Please contact me should you have any questions or require additional information concerning this matter.

Sincerely,

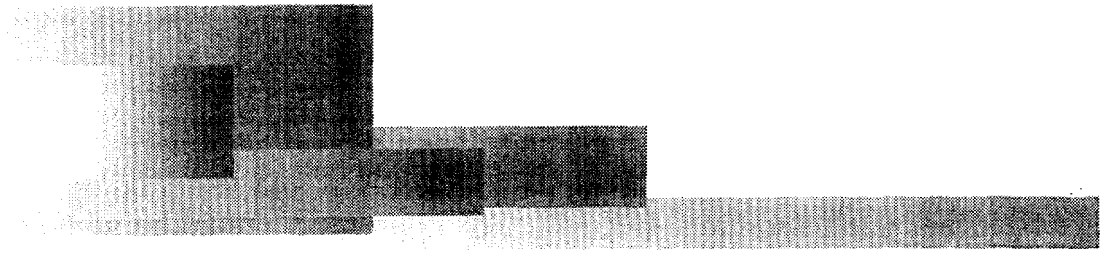


cc: David Furth  
Mary McManus  
Robert Tanner  
Suzanne Toller

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# *Inside Wire*



# *Objective:*

## *Optimum Customer Choice*

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- Customers should have the flexibility to change to different video providers, without undue expense or delay in receiving service

# *Telephony Inside Wire Rules*

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- Demarc is the Minimum Point of Entry (MPOE)
- All wiring on the property owner's side of the demarc is the property owner's responsibility
  - Property owner may choose to contract with third party, or utility, under various types of relations, to install and/or maintain inside wire
  - No regulatory constraints on changing ownership of inside wire
- Telephony inside wiring can be subject to state regulation

## *Cable Inside Wire Rules*

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- Demarc is 12 inches outside of where the cable wire enters the outside wall of the subscriber's individual dwelling unit
- When cable service is changed, existing cable providers have up to 30 days to offer to sell their wiring, and if turned down, to remove the wiring, or turn it over to the building owner for free

# *Reduce 30 Day Waiting Period*

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- Building owners are required to either purchase cable, wait 30 days to determine if the cable provider will be removing their wiring, or authorize new wiring to be run in their buildings
- Video providers today could use the 30 day waiting period as a means of preventing customers from changing video providers
  - 30 day delay in deciding if new wiring will need to be run
  - Length of time tenants are prevented from getting video service
- Building owners need the flexibility to be able to change Video Providers, without undue delay or cost

# *Recommendation:*

## *Reduce 30 Day Waiting Period*

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- The current 30 day period should be changed to 7 days
  - Would allow building owners to be better able to manage the provision of cable service in their buildings
  - Would allow alternate providers to determine what needs to be done, and provide service on a more timely basis

# *Harmonize Demarcation Points*

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- Building owners' need to understand where the Video Providers responsibilities for wiring end and their responsibility starts
- Differing, or confusing, rules add an unnecessary level of difficulty to changes in Video service
- Need to enhance customer choice by making competitive services attractive by:
  - Reducing amount of rewiring a competitor must do, and limiting substantial new investment
  - Minimizing customer disruption due to construction
- Ultimately, individual customers will have the benefit of access to multiple providers



# *Recommendation:*

## *Harmonize Demarcation Points*

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- Cable demarc point should be harmonized with telephony demarc
  - At a point more accessible to providers
  - At the first practicable point of common signal
  - Not including powered coax, where there are active electronics

# *A Level Playing Field*

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- Alternate providers of video service should be able to use existing coaxial wire
  - Under current rules, alternate providers of telephone service can use existing twisted pair inside wire
- Two wires (one coax, one twisted pair), with cross-connect capability, in each dwelling would provide customers maximum choice
  - Video provider of customer choice can connect to existing coax
  - Telephony provider of customer choice can connect to existing twisted pair

# ONE TWISTED PAIR AND ONE COAXIAL CABLE WOULD ALLOW CUSTOMERS MAXIMUM CHOICE

